

**From:** [Joseph Keenan](#)  
**To:** [Hunt, Dean D.](#)  
**Subject:** Re: Adv. Pro. No. 10-05058, Picard v. Estate of Armand Greenhall - Discovery deficiencies  
**Date:** Friday, July 08, 2016 1:48:51 PM

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I will get that to you by next Friday.

Sent from my iPhone

On Jul 8, 2016, at 10:32 AM, Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)> wrote:

Why have you still not answered the discovery?

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**From:** Hunt, Dean D.  
**Sent:** Tuesday, June 21, 2016 11:55 AM  
**To:** Joseph Keenan ([jfkeenan@joekeenanlaw.com](mailto:jfkeenan@joekeenanlaw.com))  
**Cc:** Schechter, Jody E.; Smith, Rachel M.  
**Subject:** Adv. Pro. No. 10-05058, Picard v. Estate of Armand Greenhall - Discovery deficiencies

Joe—

The responses are already significantly overdue. As stated in our recent letter, under the federal rules, because the responses are overdue, the Requests for Admission are deemed admitted and objections to the Interrogatories and Requests for Production are waived. We expect that the Interrogatory and Document Request responses will not rely on objections.

Regards,

**Dean Hunt**  
Partner

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<image001.jpg>  
811 Main Street | Suite 1100  
Houston, TX 77002-6111  
T 713.646.1346

[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)  
[bakerlaw.com](http://bakerlaw.com)  
<image002.jpg><image003.jpg>  
<image004.jpg>

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**From:** Joseph Keenan [<mailto:jfkeenan@joekeenanlaw.com>]  
**Sent:** Friday, June 17, 2016 9:55 AM  
**To:** Hunt, Dean D.  
**Subject:** Re: Adv. Pro. No. 10-05058, Picard v. Estate of Armand Greenhall - Discovery deficiencies

I am working on the replies.

Can I have 2 weeks to get you the responses.

Thank you

Joe Keenan

Sent from my iPhone

On Jun 17, 2016, at 10:52 AM, Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)> wrote:

Joe –

Update please.

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**From:** Hunt, Dean D.  
**Sent:** Thursday, June 09, 2016 4:30 PM  
**To:** 'Joseph Keenan'; Robert Miller  
**Cc:** Schechter, Jody E.; Brian Neville; Smith, Rachel M.  
**Subject:** RE: Adv. Pro. No. 10-05058, Picard v. Estate of Armand Greenhall -  
Discovery deficiencies

Update please.

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**From:** Joseph Keenan [<mailto:jfkeen@joekeenlaw.com>]  
**Sent:** Thursday, May 19, 2016 7:39 AM  
**To:** Robert Miller  
**Cc:** Schechter, Jody E.; Brian Neville; Hunt, Dean D.; Smith, Rachel M.  
**Subject:** Re: Adv. Pro. No. 10-05058, Picard v. Estate of Armand Greenhall -  
Discovery deficiencies

I will also get the responses to you,

Thank you.

Joe Keenan

Sent from my iPhone

On May 18, 2016, at 10:10 PM, Robert Miller <[rmiller@laxneville.com](mailto:rmiller@laxneville.com)>  
wrote:

Jody,

We apologize and will serve discovery responses as soon as  
possible.

Best.

Robert Miller  
Lax & Neville LLP

<image001.jpg>

1450 Broadway, 35th Floor  
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T: 212.696.1999  
F: 212.566.4531  
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[www.laxneville.com](http://www.laxneville.com)

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**From:** Schechter, Jody E. [<mailto:jschechter@bakerlaw.com>]  
**Sent:** Friday, May 13, 2016 5:24 PM  
**To:** Brian Neville <[bneville@laxneville.com](mailto:bneville@laxneville.com)>; Robert Miller <[rmiller@laxneville.com](mailto:rmiller@laxneville.com)>; [jfkeen@joekeenlaw.com](mailto:jfkeen@joekeenlaw.com)  
**Cc:** Hunt, Dean D. <[dhunt@bakerlaw.com](mailto:dhunt@bakerlaw.com)>; Smith, Rachel M. <[rsmith@bakerlaw.com](mailto:rsmith@bakerlaw.com)>  
**Subject:** Adv. Pro. No. 10-05058, Picard v. Estate of Armand Greenhall - Discovery deficiencies

Counsel,

Enclosed please find a copy of correspondence to you from Dean Hunt regarding discovery deficiencies in the above-referenced proceeding. Hard copies are being sent by class mail.

Thank you,  
Jody

**Jody Schechter**  
Associate

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<image002.jpg>  
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[jschechter@bakerlaw.com](mailto:jschechter@bakerlaw.com)

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[<image003.jpg><image004.jpg><image005.jpg>](#)

[<image006.jpg>](#)

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